

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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| UNITED STATES OF AMERICA |) |
| |) No. 15 CR 447 |
| v. |) |
| |) Violations: Title 21, United States |
| MANUEL ARAGON CONTRERAS, aka |) Code, Sections 841 and 846, and |
| “Manny,” “M,” “Dot,” “New,” and |) Title 18, United States Code, Section |
| “WEDOT.COM” |) 1956(h) |
| CESAR CARRILLO, aka “C,” “Ceez,” |) |
| “C>=)” and “MCM”; |) Second Superseding Indictment |
| EDUARDO FRANCO, aka “Gualo” and |) |
| “Glasses”; |) |
| JOSE DAVILA, aka “Whip”; |) |
| RAFAEL COLLAZO, aka “Pico”; and |) |
| BRIAN RIOS, aka “Rabias,” and “Rab” |) |

COUNT ONE

The SPECIAL AUGUST 2015 GRAND JURY charges:

1. At times material to this Indictment:

a. FedEx was a multinational parcel delivery services company that offered, among other things, parcel drop-off and delivery service across the United States, including in Los Angeles, California, and surrounding areas, and Chicago, Illinois.

b. The National Railroad Passenger Corporation, also known as “Amtrak,” was an American passenger railroad service that provided passenger and freight train service in 46 states. Amtrak operated a commercial shipping service called “Amtrak Express.” Customers could ship small packages and freight under the

size of a truckload via Amtrak Express between a number of locations where Amtrak provided passenger train service. Among other locations, Amtrak operated passenger train and Amtrak Express shipping services in Chicago, Illinois, and Los Angeles, California, and surrounding areas. Amtrak also provided passenger and shipping services between Los Angeles and surrounding areas and Chicago.

2. From no later than in or about December 2013, and continuing until at least in or about July 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MANUEL ARAGON CONTRERAS, aka “Manny,” “M,” “DOT,” “New,” and
“WEDOT.COM”;
CESAR CARRILLO, aka “C,” “Ceez,” “C>=),” and “MCM,”
EDUARDO FRANCO, aka “Gualo” and “Glasses”;
JOSE DAVILA, aka “Whip”;
RAFAEL COLLAZO, aka “Pico”; and
BRIAN RIOS, aka “Rabias” and “Rab,”

defendants herein, did conspire with each other and with Donald Williams, Edgar Valdelamar, Individuals A, B, C, D, E, and F, as well as with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

Overview of the Conspiracy

3. It was part of the conspiracy that the defendants were part of a drug trafficking organization based in and around Los Angeles, California, whose members worked together to: (1) obtain wholesale quantities of narcotics from narcotics traffickers based in Mexico and the southern California area on credit; (2) transport the narcotics from the Los Angeles area to Chicago via FedEx and Amtrak Express shipments; (3) distribute the narcotics to Donald Williams, a wholesale drug customer based in Chicago, and to other customers; (4) collect the narcotics proceeds from Williams and other customers; and (5) launder the narcotics proceeds from Chicago and elsewhere to Los Angeles, California, and surrounding areas.

Means and Methods of the Conspiracy

4. It was further part of the conspiracy that defendant ARAGON CONTRERAS and others worked together to obtain wholesale quantities of narcotics from various suppliers in Mexico and the Los Angeles, California, area, including Individuals A, B, and C.

5. It was further part of the conspiracy that defendant ARAGON CONTRERAS and others, including Individuals C, D, and E, shipped and directed others to ship via FedEx packages containing cocaine and heroin from in and around Los Angeles to hotels and other locations in Chicago and elsewhere.

6. It was further part of the conspiracy that defendants COLLAZO, RIOS, and others packaged the FedEx narcotics shipments in and around Los Angeles at the direction of defendant ARAGON CONTRERAS and others.

7. It was further part of the conspiracy that, at the direction of defendant ARAGON CONTRERAS and others, defendants RIOS, COLLAZO, Individual E, and others knowingly shipped the FedEx packages containing narcotics from in and around Los Angeles to hotels and other locations in Chicago.

8. It was further part of the conspiracy that defendants FRANCO, DAVILA, RIOS, COLLAZO, Edgar Valdelamar, Co-Conspirator E, and others received the FedEx shipments containing narcotics at hotels in Chicago and delivered the narcotics to Williams in Chicago.

9. It was further part of the conspiracy that, beginning in or around March 2015, defendants ARAGON CONTRERAS, CARRILLO, FRANCO, DAVILA, COLLAZO, RIOS, Valdelamar, Individuals B, C, D, and F, and others stopped using FedEx and began using Amtrak Express to transport their narcotics from in and around Los Angeles to Chicago via Amtrak Express shipments.

10. It was further part of the conspiracy that defendants COLLAZO, RIOS, and others concealed the narcotics contained in the Amtrak shipments in automobile parts and pool filters, and falsely filled out the bills of lading to make it appear as though they were shipping automobile parts and pool equipment rather than narcotics.

11. It was further part of the conspiracy that, at the direction of defendant ARAGON CONTRERAS, defendant CARRILLO, Co-Conspirator F, and others obtained GPS tracking devices that were placed inside the narcotics-laden Amtrak

shipments so the members of the conspiracy could monitor the narcotics as they travelled to Chicago.

12. It was further part of the conspiracy that defendants ARAGON CONTRERAS, CARRILLO, FRANCO, DAVILA, COLLAZO, RIOS, and others opened and maintained several “funnel” bank accounts that they used to make structured deposits of cash narcotics proceeds in Chicago and elsewhere, and then withdrew the cash narcotics drug proceeds in the Los Angeles area.

13. With respect to MANUEL ARAGON CONTRERAS and CESAR CARRILLO, the offense involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

The SPECIAL AUGUST 2015 GRAND JURY further charges:

On or about February 12, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MANUEL ARAGON CONTRERAS, aka “Manny,” “M,” “DOT,” “New,” and
“WEDOT.COM”;

defendant herein, did attempt to knowingly and intentionally possess with intent to distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

COUNT THREE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. On or about February 25, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MANUEL ARAGON CONTRERAS, aka “Manny,” “M,” “DOT,” “New,” and
“WEDOT.COM,”
and EDUARDO FRANCO, aka “Gualo,” and “Glasses,”

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

2. With respect to MANUEL ARAGON CONTRERAS, the offense involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance.

COUNT FOUR

The SPECIAL AUGUST 2015 GRAND JURY further charges:

On or about February 27, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MANUEL ARAGON CONTRERAS, aka “DOT,” and “WEDOT.COM,” defendant herein, did attempt to knowingly and intentionally possess with intent to distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

COUNT FIVE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. On or about April 27, 2015, at Chicago, in the Northern District of Illinois, and elsewhere,

MANUEL ARAGON CONTRERAS, aka "DOT," and "WEDOT.COM,"
and RAFAEL COLLAZO, aka "PICO,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a), and Title 18, United States Code, Section 2.

2. With respect to MANUEL ARAGON CONTRERAS, the offense involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide, a Schedule II Controlled Substance;

COUNT SIX

The SPECIAL AUGUST 2015 GRAND JURY further charges:

Beginning in or about December 2013, and continuing until at least in or about July 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MANUEL ARAGON CONTRERAS, aka “Manny,” “M,” “DOT,” “New,” and
“WEDOT.COM”;
CESAR CARRILLO, aka “C,” “Ceez,” “C>=),” and “MCM,”
EDUARDO FRANCO, aka “Gualo” and “Glasses”;
JOSE DAVILA, aka “Whip”;
RAFAEL COLLAZO, aka “Pico”; and
BRIAN RIOS, aka “Rabias” and “Rab,”

defendants herein, did knowingly conspire with each other, and with persons known and unknown to the Grand Jury, to commit offenses in violation of Title 18, United States Code, Section 1956, namely, to knowingly conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, namely felony violations of Title 21, United States Code, Sections 841 and 846, involving buying, selling, and otherwise dealing in a controlled substance, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

The SPECIAL AUGUST 2015 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) or 846, or Title 18 United States Code, Section 1956(h), as set forth in this Indictment, defendants shall forfeit to the United States of America any property which constitutes or is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used or intended to be used, in any manner or part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a), and Title 18, United States Code, Section 982.

2. The property to be forfeited includes, but is not limited to:

- a. a personal money judgment in the amount of approximately \$4,300,000 as to MANUEL ARAGON CONTREREAS, CESAR CARRILLO, EDUARDO FRANCO, JOSE DAVILA, RAFAEL COLLAZO, and BRIAN RIOS.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided by Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY